

Remarks/Arguments

A. Claims in the Case

Claims 1, 3-24, 26-51, 53-73, 147, and 488 are pending. Claims 1, 3, 4, 19, 20, 24, 26, 27, 42, 43, 51, 53, 54, 69, 70, 147, and 488 have been amended. Claims 2, 25, and 52 have been cancelled.

B. Objection

Claim 2 was objected to because the claim reads "...processing relationship value from an FSO transaction related data in the FSO computer system." Applicant has amended claim 1 to include certain features of cancelled claim 2. Amended claim 1 recites "processing relationship value from a Financial Services Organization (FSO) transaction related data in the FSO computer system". Applicant respectfully requests removal of this objection.

C. The Claims Are Not Indefinite Pursuant to 35 U.S.C. § 112, Second Paragraph

The Examiner rejected claims 19, 42, 69, and 488 as being indefinite under 35 U.S.C. § 112, second paragraph. Applicant has amended claims 19, 42, 69, and 488 for clarification. Applicant requests removal of the rejections under 35 U.S.C. § 112, second paragraph.

D. The Claims Are Not Anticipated By Sziklai Under 35 U.S.C. §102(b)

Claims 1-74, 147, and 488 were rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 6,341,287 to Sziklai et al. (hereinafter referred to as "Sziklai"). Applicant respectfully disagrees with these rejections.

The standard for “anticipation” is one of fairly strict identity. To anticipate a claim of a patent, a single prior source must contain all the claimed essential elements. *Hybritech, Inc. v. Monoclonal Antibodies, Inc.*, 802 F.2d 1367, 231 U.S.P.Q.81, 91 (Fed. Cir. 1986); *In re Donahue*, 766 F.2d 531, 226 U.S.P.Q. 619, 621 (Fed. Cir. 1985).

Claims 1, 24, and 51 have been amended to include certain features of claims 2, 25, and 52, respectively. Amended claims 1, 24, and 51 describe combinations of features including, but not limited to: “wherein at least two of the processing relationship definitions stored in the database are configured for use in preparing a processing relationship value from a Financial Service Organization (FSO) transaction-related data in the FSO computer system.” Support for the amendments to claims 1, 24, and 51 may be found in claims 2, 25, and 52 and on page 54, lines 1-12 of Applicant’s specification, which state:

As used herein, a Financial Service Organization (FSO) is a business organization that provides financial services to customers and client organizations. As used herein, the term customer generally refers to an individual, and client organization generally refers to other businesses, including retail businesses and other FSOs. Services provided to customers and client organizations include credit products, such as loans and credit cards. An FSO may also provide services to client organizations such as credit card transaction processing. Examples of FSOs include, but are not limited to, banks, credit unions, insurance companies, mutual fund companies, credit card companies and brokerage houses. An FSO that issues credit cards and processes credit card transactions may be referred to as a credit card institution. An FSO may include one or more organizational units. Examples of organizational units include, but are not limited to, main offices, divisions, regional offices, and branch offices.

Sziklai does not appear to teach or suggest at least the above-quoted features of claims 1, 24, and 51, in combination with the other features of the claims.

Sziklai states:

The report trigger table 56 records the triggers specified for reports in the system. The worklist item table 57 provides definitions of, and links to, modules launched from the worklist. The worklist table 58 provides the definitions and logic for worklists that facilitate work flow for a business activity. The calculation profile table 59 provides the definitions and logic to perform calculations related to data entry forms, for decision making and data input. The calculation profile value table 60 records the calculation profile variable values.
(Sziklai, column 13, lines 23-32)

Sziklai further states:

With reference to FIG. 3, the constraint column table 81 provides individual data elements for the business rules. The constraint table 82 provides the business rules defined at the database level for every table in the application system, together with the meaning of each rule. The column table 72 is characterized in the preceding. The column allowable value table 83 provides the business rules at a data element level. The autofill table 84 records the automatic data transfer setup. The arc column table 85 provides data elements that are part of every usually exclusive relationship in the system. The arc table 86 records the mutually exclusive relationships in the system. The lookup table 87 provides the lookup definitions for every child table in the system. The tablename table 69 is characterized in the preceding. The object table 88 holds the names of the database objects defined in the system. The about table 89 stores versions of, and copyright information concerning, the system. The datatype table 90 provides the datatype definitions throughout the system. The dependency tree table 91 provides the application and database hierarchy(ies). The color table 92 provides the color definitions for use in various tools.
(Sziklai, column 13, line 58 to column 14, line 12)

Sziklai appears to teach tables that provide definitions and logic for worklists. Sziklai also appears to provide tables that define business rules and data elements for the rules. Sziklai does not appear to teach or suggest processing relationship definitions stored in a database that are configured for use in preparing a processing relationship value from a Financial Service Organization (FSO) transaction-related data in an FSO computer system, in combination with the other features of claims 1, 24, and 51.

Applicant submits that, for at least the reasons discussed above, claims 1, 24, and 51 and

the claims depending thereon are patentable over the cited art. Applicant therefore respectfully requests removal of the 35 U.S.C. §102(b) rejections of these claims.

Applicant submits that many of claims dependent on claims 1, 24, and 51 are independently patentable. For example, claim 3 recites: “wherein the processing relationship value is configured for use in identifying an FSO business entity as an owner of the FSO transaction-related data.” Sziklai does not appear to teach or suggest at least these features of claim 3, in combination with the other features of the claim.

The portions of Sziklai cited in the Office Action for the above-quoted feature of claim 3 state:

C. About Change Agent System describes the regulatory change system version information.

The system provides a “business application browser” that combines Web browser technology with a selected set of business application items that are common to the tasks to be performed to implement information management for a given business area or requirement, including common functions such as work/task management, data entry, reporting, data processing and analysis, data presentation (printing, electronic display, distribution, etc.), and report and document preparation.

(Sziklai, column 22, lines 10-20)

Sziklai appears to teach a business application browser that combines web browser technology with items common to tasks to be performed to implant information management for a given business area. Sziklai does not appear to teach or suggest configuring a processing relationship value for use in identifying an FSO business entity as an owner of FSO transaction-related data.

Claim 8 recites: “wherein the preparing the processing relationship definition comprises creating a highest level processing relationship object in a processing relationship structure, wherein the highest level processing relationship object represents an FSO.” Sziklai does not

appear to teach or suggest at least this feature of claim 8, in combination with the other features of the claim.

The portions of Sziklai cited in the Office Action for the above-quoted feature of claim 8 state:

The View Business Area table 36 records information about business area Views in the system. The Business Area table 37 holds the definition of business areas and forms a high level grouping of various business functions that can be implemented using the system. The business process business area table 38 records information about business area processes in the system. The business area worklist table 39 records worklists for the business area. The View parameter table 40 holds the parameters that define all views in the system.
(Sziklai, column 22, line 34 to column 23, line 36)

Sziklai appears to teach a “Business Area” table that hold definitions of business areas and forms a high level grouping of various business functions. Sziklai does not appear to teach or suggest preparing the processing relationship definition comprising creating a highest level processing relationship object in a processing relationship structure, the highest level processing relationship object representing a financial service organization.

Claim 11 recites: “wherein the displaying one or more processing relationship object representations on a display screen comprises displaying values associated with a sequence number and a level number.” Sziklai does not appear to teach or suggest at least this feature of claim 11, in combination with the other features of the claim.

The portions of Sziklai cited in the Office Action for the above-quoted feature of claim 11 state:

The arc table 86 records the mutually exclusive relationships in the system. The lookup table 87 provides the lookup definitions for every child table in the system. The tablename table 69 is characterized in the preceding. The object table 88 holds the names of the database objects defined in the system. The about

table 89 stores versions of, and copyright information concerning, the system. The datatype table 90 provides the datatype definitions throughout the system. The dependency tree table 91 provides the application and database hierarchy(ies). The color table 92 provides the color definitions for use in various tools.
(Sziklai, column 14, lines 1-12)

FIG. 5 of Sziklai depicts relationships between several “metadata” tables. Sziklai appears to disclose tables that hold definitions, relationships, names, versions of the system, copyright information, and application and database hierarchy. Sziklai does not appear to teach or suggest wherein displaying processing relationship object representations on a display screen comprise displaying values associated with a sequence number and a level number.

Amended claim 20 recites: “wherein the processing relationship object representations comprises a class of objects representing an FSO company or an FSO business unit or a bank branch office or a regional bank or a credit card line or an issuer or an acquirer.” Sziklai does not appear to teach or suggest at least this feature of claim 20, in combination with the other features of the claim.

The portions of Sziklai cited in the Office Action for the above-quoted feature of claim 20 state:

In a similar manner, reports and other output documents exist only in the metadata created through the Java data management layer. These output documents are produced by interpreting the metadata and by extracting data from the particular business content chosen. Events may be set up based on one or more changes in the business content data, but processing of an event depends on metadata that defines the event. Processing steps can be created to summarize and “filter” data, depending upon the metadata defining the summarization and filtering techniques. Data can be imported from, and exported to, other systems based on metadata definitions of data structures.
(Sziklai, column 15, lines 21-32)

Assume that a data entry form is to be created based on the Department Table of the invention. FIG. 6 is a flow chart showing the steps used to accomplish this. In step 101, the Form Builder function is launched from the Tools Menu. In step 103, the form is given a name, and the Department Table is selected as the base table. In step 105, one or more fields are chosen for incorporation in the data entry form, and the form is uploaded to the network. A maximum of three steps is required to create a data entry form using the invention. The data entry form and its definition may be assumed to be bug-free, because the underlying Form Builder has been thoroughly tested and confirmed to generate the correct metadata definition of the desired form.
(Sziklai, column 16, lines 22-34)

Sziklai appears to teach documents produced by interpreting metadata and extracting data from a particular business content. Sziklai further appears to teach a data entry form based on a “Department Table”. Sziklai does not appear to teach or suggest processing relationship object representations comprising a class of objects representing an FSO company, an FSO business unit, a bank branch office, or a regional bank, a credit card line, a credit card issuer, or credit card acquirer.

Amended claim 147 describes a combination of features including, but not limited to: “wherein the one or more processing parameter values define an FSO entity in an FSO processing relationship tree structure stored in the database, wherein the FSO business entity is an FSO company or an FSO business unit or a bank branch office or a regional bank or a credit card line or an issuer or an acquirer”. Sziklai does not appear to teach or suggest at least the above-quoted feature of claim 147, in combination with the other features of the claim.

Sziklai states:

The business content layer includes business knowledge, logical designs, physical designs, physical structures, relationships, and data associated with a selected area of business activity. A business area can be a functional field within an organization, such as finance or human resources, or a particular type of business, such as printing or a (specialty) food business, for which business-related data must be accumulated and managed. The business content layer is

defined by and referenced in the metadata layer so that the necessary objects, tables, columns, relationships, functions, procedures and data can be read and updated by the Java data management layer. The business content layer may be characterized as a business content database.

(Sziklai, column 12, lines 9-21)

Sziklai appears to teach a business content layer that includes business knowledge, logical designs, physical designs, physical structures, relationships, and data associated with a selected area of business activity. Sziklai does not appear to teach or suggest processing parameter values that define an FSO entity in an FSO processing relationship tree structure stored in the database, wherein the FSO business entity is an FSO company, an FSO business unit, a bank branch office, a regional bank, a credit card line, a credit card issuer, or a credit card acquirer.

Claim 488 describes a combination of features including, but not limited to:

wherein the computer system is configured to:

- receive a first FSO transaction-related data,
- read the selected plurality of field identifiers from the first memory in response to the computer system receiving the first FSO transaction-related data,
- access and read a first processing parameter from the second memory using FSO transaction-related data contained in fields of the first FSO transaction-related data that are identified by the selected plurality of field identifiers read from the first memory, and
- process the first FSO transaction-related data and the first processing parameter.

Sziklai does not appear to teach or suggest at least the above-quoted feature of claim 488, in combination with the other features of the claim.

The Office Action states:

As per claim 488, Sziklai teaches: A method of configuring a computer system for receiving and processing Financial Service Organization (FSO) transaction-related data, wherein each FSO transaction-related data is defined by a plurality of fields, each of which contains the FSO transaction-related data, the method comprising:

displaying a plurality of field identifiers on a display screen of a monitor, wherein the monitor is in data communication with the computer system, a first memory, and a second memory, wherein each of the displayed field identifiers identifies a respective field in each of the FSO transaction-related data; selecting a plurality of the displayed field identifiers; storing the selected plurality of field identifiers in the first memory; wherein the computer system is configured to receive a first FSO transaction-related data, wherein the computer system is configured to read the selected plurality of field identifiers from the first memory in response to the computer system receiving the first FSO transaction-related data, wherein the computer system is configured to access and read a first processing parameter from the second memory using FSO transaction-related data contained in fields of the first FSO transaction-related data that are identified by the selected plurality of field identifiers read from the first memory, and wherein the computer system is configured to process the first FSO transaction-related data and the first processing parameter (col. 20, lines 38-43, col. 21, lines 4-23, col. 29, lines 43-56 and lines 65-67, and col. 30, lines 1-16 and lines 44-65).

Because the above-quoted portion of the Office Action merely recites all of the features of claim 488, then lists a string of citations from Sziklai, Applicant is unable to determine which portions of Sziklai the Examiner believes teach or suggest each of the many features of claim 488. Applicant respectfully requests that the Examiner specifically point out how the teachings in Sziklai support the rejection of the features of claim 488, or that the Examiner remove the rejection.

E. Summary

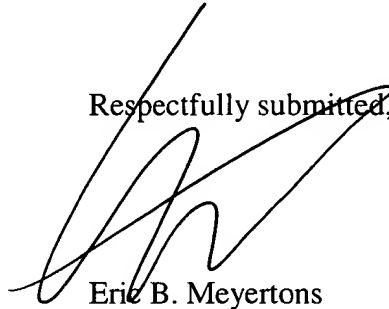
Based on the above, Applicant submits that the claims are now in condition for allowance. Favorable reconsideration is respectfully solicited.

If any extension of time is required, Applicant hereby requests the appropriate extension of time. Should any fees be required, or if any fees have been overpaid, the Commissioner is

Bobbitt, et al.
09/699,015

authorized to appropriately charge or credit those fees to Meyertons, Hood, Kivlin, Kowert & Goetzel Deposit Account No. 50-1505/5053-30802/EBM.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Eric B. Meyertons', written over the words 'Respectfully submitted,'.

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